

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
BEFORE THE IOWA UTILITIES BOARD

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IN RE COMPLAINT OF:

) Docket No. FCU-2013-0005  
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HANCOCK COUNTY HEALTH SYSTEMS

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**RURAL CALL COMPLETION ACTION PLAN**

Respectfully submitted

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ATTORNEYS FOR AIRUS, INC.

PROOF OF SERVICE

I hereby certify that the foregoing document was automatically served electronically on all parties registered with the Electronic Filing System on: September 9, 2016.

Signature: /s/ Lori McKimpson

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## **RURAL CALL COMPLETION ACTION PLAN**

### **PURPOSE**

To establish a Rural Call Completion Action Plan (hereafter "RCC Action Plan") for Airus, Inc. for addressing rural call completion problem reports/complaints.

### **OBJECTIVE**

To ensure that incidences of rural call completion problems reported to or identified by Airus are investigated and remedied.

### **RECORD RETENTION**

All information collected regarding a reported rural call completion problem will be kept by the Company for a minimum of two (2) calendar years.

### **COMPLIANCE OFFICER**

The Vice President of Regulatory Affairs is designated as the RCC Compliance Officer. The RCC Compliance Officer is responsible for oversight and implementation of the RCC Action Plan, including resolution and reporting of reported or identified rural call completion problems.

Current RCC Compliance Officer contact information:

Julie Oost  
Airus, Inc.  
840 S. Canal Street, 7<sup>th</sup> Floor  
Chicago, IL 60607  
Phone: (312) 878-4137  
Fax: (312) 757-4874  
Email: [RCC@airustel.com](mailto:RCC@airustel.com) with copy to [regulatory@airustel.com](mailto:regulatory@airustel.com)

### **RURAL CALL COMPLETION REPORT/COMPLAINT INTAKE**

A RCC report/complaint may be directed to either Airus' website or telephone number. The URL for this webpage is: <http://www.airustel.com/call-completion-problem-reporting>. This webpage contains both an email and telephone number that can be used to report rural call completion problems. If a rural call completion report/complaint is submitted according to the website instructions, it will be routed directly to the RCC Compliance Officer and RCC response team. If a rural call completion report/complaint is submitted by other means, Airus will ensure that the report/complaint is promptly routed to the RCC Compliance Officer and RCC response team.

### **OPERATING PROCEDURES**

All reports/complaints regarding rural call completion problems (regardless of who within Airus receives the original report/complaint) will be forwarded to the following email address: [RCC@airustel.com](mailto:RCC@airustel.com). This is an email dedicated specifically to receiving reports/complaints about rural call completion problems and will be automatically forwarded to the RCC Compliance Officer, a contact within Airus' regulatory department, and at least one contact within Airus' operations/network department. Currently, emails sent to [RCC@airustel.com](mailto:RCC@airustel.com) will automatically forward to Airus' RCC response team consisting of: Julie Oost (VP of Regulatory Affairs), Patrick Phipps (Director of Regulatory Affairs), Scott Kell (EVP of



Operations), and John McCluskey (General Manager). Once a rural call completion report/complaint is received or identified, Airus will undertake the following actions:

- Within one (1) business day of receiving or identifying the report/complaint, Airus will (a) log the report/complaint into the its rural call completion tracking log; (b) begin investigating whether and to what extent Airus was involved in the routing of the call in question; (c) if so, begin identifying known intermediate providers in the call path, and (d) begin investigating the details of the problem.
- Within five (5) business days of receiving or identifying the report/complaint, Airus will: (1) determine whether it was involved in the path of the call, (2) initiate a trouble ticket with known intermediate providers (if necessary), (3) collect all relevant details about the problem (including cause of problem, if known), and (4) log this information into the rural call completion tracking log.
- To the extent the cause of the problem is identified and within the control of Airus, Airus will make commercially reasonable efforts to resolve the problem as soon as practical. Airus may temporarily remove from routing any intermediate provider that it uses that it has reason to believe is causing call completion problems, and will work cooperatively with each such intermediate provider to analyze and resolve such problems as soon as practical. The method of resolution will be logged into the rural call completion tracking log.
- To the extent that Airus' investigation reveals a possible problem with the rural LEC's network or call signaling practices, Airus will promptly notify the rural LEC and request troubleshooting and correction. To the extent that Airus does not already have contact information for the rural LEC, it will consult the following sources: LERG, rural LEC's website, the FCC's Form 499 database and NECA Tariff No. 5.
- During this investigatory and resolution process, Airus will cooperate with and provide timely information to the appropriate legal and/or regulatory bodies. Information provided to such entities is to be treated confidentially.

#### **QUARTERLY INVESTIGATIONS**

Airus will perform a quarterly review of call statistics related to the rural OCNs developed from the NECA OCN list. Airus will investigate any persistent rural call completion problems.

#### **LIMITING INTERMEDIATE PROVIDERS**

Airus will remove carriers from route upon request or if it determines the offending carriers is causing a persistent problem.

#### **EMPLOYEE COMPLIANCE AND TRAINING**

The RCC Compliance Officer will distribute this RCC Action Plan to all Company employees on an annual basis. The Airus will periodically review and revise the Action Plan to ensure that the information remains current and accurate. Any revisions to the Action Plan will be promptly distributed to Company personnel, and the website updated, if necessary.

#### **COMPLIANCE WITH RURAL CALL COMPLETION RULES**

This RCC Action Plan is not intended to conflict with or be inconsistent with any applicable rural call completion rules established by a governing regulatory body.

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### **Addendum 1**

Addendum 1 outlines requirements pursuant to Orders issued in Iowa Utilities Board Docket Nos. FCU-2013-0005 and FCU-2013-0007.

#### **REPORTING REQUIREMENTS/FREQUENCY**

***Quarterly Reports:*** Airus will submit quarterly reports (on a confidential basis) for a one-year period to the Iowa Utilities Board that contains (at a minimum) the following information: (1) description of the progress Airus is making fulfilling its commitments, (2) details on any rural call completion problems in Iowa reported to/identified by Airus since the last report, (3) and steps Airus has taken to resolve any such problems. Airus will submit these quarterly reports to the Iowa Utilities Board on or before the following dates: 09/30/2016, 12/31/2016, 03/31/2017 and 06/30/2017.

***Annual Reports:*** Airus will provide annual reports to the Iowa Utilities Board for a three-year period. Such annual reports will: (1) certify that Airus continues to abide by this RCC Action Plan (including the commitments it made in its Iowa Proposed Long-Term Solution); (2) report on Airus' progress in addressing and preventing call completion problems; and (3) explain whether Airus has received reports of call completion problems in Iowa and the steps Airus took to resolve the problems. Airus will submit these annual reports to the Iowa Utilities Board on or before the following dates: 08/12/2017, 08/12/2018, and 08/12/2019.

***FCC Reports:*** Airus will also provide copies of the Airus-specific Iowa portion of the federal data and the Federal Communications Commission's ("FCC's") analysis of the Airus-specific Iowa data to the Iowa Utilities Board and Iowa Office of Consumer Advocate. Currently, the FCC's rural call completion reporting requirements do not apply to Airus; however, Airus will begin providing this information if the FCC requirements are applied to Airus in the future.

#### **NETWORK MANAGEMENT**

To ensure a properly-functioning network and help minimize RCC issues, Airus commits to the following network management principles: (1) Airus will have a properly-designed and properly-functioning network and mechanisms in place to ensure that calls it receives are timely completed or released back to the upstream carrier; (2) Airus will have properly-designed and functioning mechanisms in place to detect and control looping; (3) Airus will continue to conduct standardized testing routines; (4) Airus will continue to hold vendor performance meetings; (5) Airus will continue to monitor ATIS standards and implement ATIS standards when consistent with Airus's network policies; and (6) Airus will continue to keep routing tables up-to-date through the Local Exchange Routing Guide ("LERG").

#### **DOWNSTREAM CARRIER MANAGEMENT**

Airus commits to the following actions in order to manage the performance of downstream carriers it uses to route calls in Iowa: (1) Airus will continue to use interoperability testing at turn-up to minimize system limitations and interoperability issues; (2) Airus will continue to use internal "report cards" for vendors in order to assist in identifying downstream carriers that may need to improve performance; (3) Airus will develop an addendum to vendor contracts that define commitments to standards; and (4) Airus will include in confidentiality agreements with vendors provisions that state that Airus is permitted



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to provide the identity of the vendor to the Iowa Utilities Board in response to a Board inquiry involving a call completion issue.